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*Attorneys for the Debtors and
Debtors-in-Possession*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

-----X	
In re:	§ Case No. 22-80000-sgj11
	§ (Jointly Administered)
CHRISTIAN CARE CENTERS, INC. and	§
CHRISTIAN CARE CENTERS FOUNDATION,	§ Chapter 11
INC. ¹	§
Debtors.	§
-----X	

**A HEARING WILL BE CONDUCTED ON THIS MATTER
ON NOVEMBER 30, 2022, AT 9:30 A.M. IN COURTROOM 1,
14TH FLOOR OF THE EARLE CABELL FEDERAL
BUILDING, 1100 COMMERCE STREET, DALLAS TX 75242.
IF YOU OBJECT TO THE RELIEF REQUESTED, YOU
MUST RESPOND IN WRITING, SPECIFICALLY
ANSWERING EACH PARAGRAPH IN THIS PLEADING,
UNLESS OTHERWISE DIRECTED BY THE COURT, YOU**

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are Christian Care Centers, Inc. (9664) and Christian Care Centers Foundation (3572). The Debtors' mailing address is 900 Wiggins Parkway, Mesquite TX 75150.

MUST FILE YOUR RESPONSE WITH THE CLERK OF THE BANKRUPTCY COURT WITHIN TWENTY-THREE DAYS FROM THE DATE YOU WERE SERVED WITH THIS PLEADING. YOU MUST SERVE A COPY OF YOUR RESPONSE ON THE PERSON WHO SENT YOU THE NOTICE; OTHERWISE, THE COURT MAY TREAT THE PLEADING AS UNOPPOSED AND GRANT THE RELIEF REQUESTED.

**MOTION FOR ENTRY OF ORDER AUTHORIZING DEBTOR CHRISTIAN CARE
CENTERS, INC. TO CHANGE ITS NAME**

Christian Care Centers, Inc. (“CCCI”) and Christian Care Centers Foundation, Inc. (the “Foundation”), as debtors and debtors-in-possession (collectively, the “Debtors”), by and through counsel, submit this Motion for Entry of Order Authorizing Christian Care Centers, Inc. to Change its Name (the “Motion”). In support of this Motion, Debtors respectfully represent as follows:

I. JURISDICTION AND VENUE

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).
2. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.
3. The statutory and other predicates for the relief requested herein are 11 U.S.C. §§ 105(a), 363(b), and Federal Rule of Bankruptcy Procedure 6004.

II. BACKGROUND

4. On May 23, 2022 (the “Petition Date”), Debtors filed voluntary petitions for relief under Chapter 11 of Title 11 of the United States Code (the “Bankruptcy Code”) in this Court.
5. CCCI continues to operate and manage its businesses as a debtor-in-possession pursuant to 11 U.S.C. §§ 1107(a) and 1108. The Foundation is no longer doing business.
1. On the Petition Date, Debtors filed their *Motion for Order (A) Approving the Sale of Assets of Debtors, (B) Approving Bid Procedures and Protections in Connection with the Sale of Substantially All of the Debtors’ Assets, (C) Approving Assumption and Assignment of*

Executory Contracts, and (D) Granting Other Related Relief [Dkt. No. 31] (the “Motion to Sell”).

6. On June 9, 2022, the United States Trustee for the Northern District of Texas noticed the amended appointment [Dkt. No. 114] of the Official Committee of General Unsecured Creditors (the “Committee”). No trustee or examiner has been appointed.

7. On June 23, 2022, this Court issued its *Order (A) Approving the Sale of Assets of Debtors, (B) Approving Bid Procedures and Protections in Connection with the Sale of Substantially All of the Debtors’ Assets, (C) Approving Assumption and Assignment of Executory Contracts, and (D) Granting Other Related Relief* [Dkt. No. 184] (the “Bidding Procedures Order”). The Bidding Procedures Order established North Texas Benevolent Holdings, LLC (the “Buyer”) as the stalking horse bidder for purchase of substantially all of CCCI’s assets.

8. On July 15, 2022, Debtors filed their *Notice of Cancellation of Auction and Designation of the Stalking Horse Bid as the Successful Bidder* [Dkt No. 236] designating Buyer as the winning bidder under the Bidding Procedures Order.

9. On July 21, 2022, this Court issued its Order granting the Motion to Sell [Dkt No. 264] (the “Sale Order”). The Sale Order authorized and approved the sale of substantially all of CCCI’s assets to Buyer pursuant to the terms of the asset purchase agreement, included as an exhibit to the Motion to Sell.

10. The Sale is expected to close on or about December 1, 2022.

11. On September 22, 2022, this Court issued its *Order Pursuant to Bankruptcy Code § 1121 (d) Extending Debtors’ Exclusivity Period to File a Plan and Solicit Votes in Connection Therewith* [Dkt. No. 339] extending Debtors’ exclusive time to file a plan and solicit votes in connection therewith until December 1, 2022.

12. A hearing on the confirmation of Debtors’ plan is anticipated to occur in late December 2022 (“Plan Confirmation Hearing”).

III. RELIEF REQUESTED

13. The Debtors ask the Court to permit CCCI to legally change its name to CCC Wind Down, Inc. The Debtors make this request so that the Buyer can use the names of CCCI upon the closing of the Sale. In doing so, Debtor CCCI will exit bankruptcy as “CCC Wind Down, Inc., f/k/a Christian Care Centers, Inc.”

14. By this Motion, the Debtors request the entry of the Final Order, substantially in the form of **Exhibit A**, effectuating the foregoing requested relief.

IV. BASIS FOR RELIEF

A. The Court Should Enter an Order Approving the Name Change to Effectuate Closing Requirements.

15. Section 363(b)(1) of the Bankruptcy Code provides that “the trustee, after notice and a hearing may use, sell, or lease, other than in the ordinary course of business, property of the estate.” 11 U.S.C. § 363(b)(1); *Official Comm. of Unsecured Creditors of LTV Aerospace & Defense Co. v. LTV Corp. (In re Chateaugay Corp.)*, 973 F.2d 141, 143 (2d Cir. 1992) (holding that a court may approve an application under Section 363(b) upon a showing of a good business reason for the disposition). Further, Bankruptcy Code Section 105(a) empowers the Court to “issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of [the Bankruptcy Code].” 11 U.S.C. § 105(a).

16. CCCI seeks to change its name shortly after the closing of the sale of its assets (but before its Plan of Liquidation becomes effective) so Buyer can use affiliated names of CCCI upon closing. Further, by completing the sale, Debtors will be able to maximize the value of Debtors’ assets and provide optimal payment to creditors. An Order approving CCCI’s name change to CCC Wind Down, Inc. is appropriate and within the Debtors’ business judgment as the name

change will allow the Buyer to continue operations using affiliated names of CCCI and cause less disruption and confusion to residents and other vendors.

17. Upon approval of Debtor CCCI changing its name to CCC Wind Down, Inc., the Debtors respectfully request that the Court continue to maintain one file and one docket for the jointly administered Chapter 11 Cases under the case styling “CCC Wind Down, Inc., F/K/A Christian Care Centers, Inc., and Christian Care Centers Foundation, Inc.” and that these Chapter 11 Cases be administered under a consolidated caption (the “Consolidated Caption”) as follows:

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	X	
	§	Case No. 22-80000-11
	§	
CCC WIND DOWN, INC., F/K/A	§	
CHRISTIAN CARE CENTERS, INC. and	§	Chapter 11
CHRISTIAN CARE CENTERS FOUNDATION,	§	
INC. ¹	§	
	§	
Debtors.	§	(Jointly Administered)
	X	

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are CCC Wind Down, Inc., f/k/a Christian Care Centers, Inc. (9664) and Christian Care Centers Foundation (3572). The Debtors’ mailing address is 900 Wiggins Parkway, Mesquite TX 75150.

18. For these reasons, Debtors respectfully request the Court approve the name change of Debtor CCCI to CCC Wind Down, Inc.

B. The Court Should Alter the 14 Day Stay Enumerated in Rule 6004.

19. To the extent that the relief sought in the Motion constitutes a use of property under Bankruptcy Code Section 363(b), the Debtors seek a waiver of the fourteen-day stay under Bankruptcy Rule 6004(h). Further, to the extent applicable, the Debtors request that the Court find that the provisions of Bankruptcy Rule 6003 are satisfied. As explained herein, the relief

requested in this Motion is immediately necessary for the Debtors (and Buyer) to be able to continue to operate their businesses, preserve the value of the estates, and complete closing.

V. NOTICE

20. Notice of this Motion will be provided to: (a) the U.S. Trustee; (b) the holders of the thirty (30) largest unsecured claims against the Debtors on an aggregate basis; (c) the secured creditors of the Debtors; (d) UMB Bank, N.A., as Trustee and counsel thereto; (e) the United States Attorney's Office for the Northern District of Texas; (f) the Committee; and (g) any party that has requested notice pursuant to Bankruptcy Rule 2002.

CONCLUSION

WHEREFORE, the Debtors respectfully request that the Court enter an order substantially in the form attached hereto as **Exhibit A**, granting the relief requested herein and granting such other relief as the Court deems just, proper and equitable.

Dated: November 4, 2022.

Respectfully Submitted,

/s/ Buffey E. Klein
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